

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	BKY. NO. 14-17967 elf
ADAM KESSLER AND DAWN KESSLER	:	CHAPTER 13
Debtors	:	
ADAM KESSLER AND DAWN KESSLER	:	
Plaintiffs	:	
v.	:	ADVERSARY NO. 15-00177
WELLS FARGO BANK, N.A.	:	
Defendant	:	

**AMENDED**  
**STIPULATION RESOLVING COMPLAINT TO**  
**CRAM DOWN AND MODIFY CLAIM**

WHEREAS, the parties hereto, and their respective counsel, have agreed as to the disposition of the Complaint to Cram Down and Modify Claim filed by Debtors.

NOW, THEREFORE, intending to be legally bound, the parties hereto, herewith stipulate as follows:

1. Debtor's Complaint to Cram Down WELLS FARGO BANK, N.A.'s (Defendant) mortgage, is hereby settled upon the conditions more particularly set forth herein.
2. Defendant's mortgage dated July 9, 2005, recorded on August 5, 2005, at Book 4565, Page 1339 in the office of the Bucks County Recorder of Deeds ("the Mortgage") is hereby crammed down to \$0.00 and shall be treated as an allowed unsecured claim to be paid in accordance with debtors Chapter 13 Plan.
3. Defendant's mortgage shall remain a valid lien on the real property commonly known as 1752 Lafayette Drive, Jamison, PA 18929, until completion of the payments due under the debtors Chapter 13 Plan of Reorganization.

4. If this bankruptcy case is converted to any other Chapter or dismissed, the cram down of the mortgage shall be deemed null and void so that the Mortgage shall remain a valid and binding lien upon the Property.
5. If the Mortgaged Property is sold or refinanced prior to the completion of the Chapter 13 Plan payments, the Debtors cram down of the Mortgage shall be deemed null and void so that the Mortgage shall remain a valid and binding lien upon the Property.
6. The parties agree that a facsimile may be submitted to the Court as if it were an original.

**STIPULATED AND AGREED TO BY:**

/s/ Michael P. Kelly

Michael P. Kelly, Esquire  
Attorney for Debtors/Plaintiffs

Dated: 4/16/2019

/s/ Jill Manuel-Coughlin, Esquire  
Jill Manuel-Coughlin, Esquire  
Attorney for Defendant

Dated: 4/16/2019

On this            day of            , 2019 **IT IS HEREBY ORDERED** that the  
above Stipulation be approved and made an Order of this Court.

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Eric L. Frank  
United States Bankruptcy Judge